

1 WRIGHT, FINLAY & ZAK, LLP
2 Darren T. Brenner, Esq. (NBN 8386)
3 Christina V. Miller, Esq. (NBN 12448)
4 Lindsay D. Dragon, Esq. (NBN 13474)
5 Yanxiong Li, Esq. (NBN 12807)
6 7785 W. Sahara Ave., Suite 200
7 Las Vegas, NV 89117
8 (702) 475-7964; Fax: (702) 946-1345
9 dbrenner@wrightlegal.net
10 cmiller@wrightlegal.net
11 ldragon@wrightlegal.net
12 yli@wrightlegal.net

13 *Attorney for Plaintiff, Wilmington Trust, National Association, not in its individual capacity but*
14 *as Trustee of ARLP Securitization Trust, Series 2014-2*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 WILMINGTON TRUST, NATIONAL
13 ASSOCIATION, NOT IN INDIVIDUAL
14 CAPACITY BUT AS TRUSTEE OF ARLP
15 SECURITIZATION TRUST, SERIES 2014-2,
16 a Federal Savings Bank,

17 Plaintiff,

18 vs.

19 COMMONWEALTH LAND TITLE
20 INSURANCE COMPANY,

21 Defendant.

Case No.: 2:18-cv-02023-GMN-BNW

**STIPULATION TO EXTEND TIME TO
RESPOND TO MOTION TO DISMISS
[ECF NO. 83]**

(First Request)

22 COMES NOW, Plaintiff, Wilmington Trust, National Association, not in its individual
23 capacity but as Trustee of ARLP Securitization Trust, Series 2014-2 (“Wilmington Trust”) and
24 Defendant, Commonwealth Land Title Insurance Company (“Commonwealth”, collectively, the
25 “Parties”), by and through their respective undersigned counsels, stipulate and agree as follows:

- 26 1. On March 12, 2024, Commonwealth filed a Motion to Dismiss [ECF Nos. 83];
- 27 2. Wilmington Trust’s deadline to respond to Commonwealth’s Motion to Dismiss is
28 currently March 26, 2024;

- 1 3. This is one of five cases pending before this Court in which similar Motions to
2 Dismiss have been filed and with the same deadline for a response¹. Good cause
3 exists for a brief extension as counsel for Wilmington Trust reasonably requires
4 additional time to diligently prepare responses given the numerous Motions to
5 Dismiss due at the same time. Wilmington Trust requests a two-week extension up to
6 and including April 9, 2024 to file its response to Commonwealth's Motion to
7 Dismiss;
- 8 4. Counsel for Commonwealth does not oppose the requested extension;
- 9 5. This is the first request for an extension and is made in good faith and not for purposes
10 of undue delay or prejudice.

11 **IT IS SO STIPULATED.**

12 DATED this 25th day of March, 2024.

13 WRIGHT, FINLAY & ZAK, LLP

14 _____
15 /s/ Yanxiong Li, Esq.

16 Yanxiong Li, Esq.
17 Nevada Bar No. 12807
18 7785 W. Sahara Ave., Suite 200
19 Las Vegas, NV 89117
20 Attorneys for Plaintiff, Wilmington Trust,
21 National Association, not in its individual
22 capacity but as Trustee of ARLP
23 Securitization Trust, Series 2014-2

 DATED this 25th day of March, 2024.

 SINCLAIR BRAUN KARGHER LLP

 /s/ Kevin S. Sinclair, Esq.

 Kevin S. Sinclair, Esq.
 Nevada Bar No. 12277
 15260 Ventura Blvd., Ste 715
 Sherman Oaks, California 91403
 Attorneys for Defendant, Commonwealth
 Land Title Insurance Company

21 **IT IS SO ORDERED.**

22 DATED: March 26, 2024

23 _____
24 DISTRICT COURT JUDGE

25 _____
26 ¹ The other four cases being *Wells Fargo Bank, N.A. v. Commonwealth Land Title Insurance*
27 *Company*, Case No. 2:19-cv-00803-GMN-EJY; *U.S. Bank National Association v. Fidelity*
28 *National Title Group, Inc., et al*, Case No. 2:21-cv-01454-GMN-NJK; *U.S. Bank, National*
 Association v. Fidelity National Title Insurance Company, Case No. 2:19-cv-00809-GMN-BNW;
 Deutsche Bank National Trust Company v. Fidelity National Title Group, Inc., et al, Case No.
 2:20-cv-01886-GMN-BNW.